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NAME OF COMMITTEE (In Full)  
SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC

FEC IDENTIFICATION NUMBER  
C00570226

Mailing Address 1155 15th St NW

City	State	ZIP Code
Washington	DC	20005-2706

IDENTIFICATION NUMBER: C00570226  
REFERENCE: AMENDED MID-YEAR REPORT (01/01/2017 - 06/30/2017), RECEIVED  
01/31/2018

Your amended report discloses an increase in receipts totaling \$607,776.02 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)

Committees Response

The PACs Mid-Year 2017 Report Amendment 2, filed with the Commission on January 31, 2018, included up-to-date data that was missing from its original Mid-Year 2017 Report. As the Commission is aware, the PAC stated in a FEC Form 99 filed on December 22, 2017, that it would be “researching alternative software that may prevent a future data recovery error.” During the process of rebuilding the defective FEC.dcf file used to create the original report, it was discovered that additional receipts were not included. The additional receipts data was held in a separate electronic file that was not uploaded to FEC’s DISCLOSE system. Also, during that process, and while rebuilding the file and creating an amended report, PAC staff communicated with FEC technical and RAD staff with regard to the matter, and – rather than submit multiple amendments – PAC staff decided to migrate from using FEC.dcf files to the use of advanced commercial software that is more capable of handling the volume of receipts received by the PAC. The PAC waited for installation of the advanced software while rebuilding the information missing from the defective FEC.dcf, amending the report, and adding the missing data.

In addition to upgrading its software, the PAC has increased its filing schedule from quarterly to monthly disclosure of its campaign finances. As the bulk of the missing data was from individual contributions under \$200 (in aggregate), the individual contributor information was not required to be itemized. However, with the new software, the PAC is enabled to fully report most of its contributors’ respective information and better track excessive contributions if they occur.

When contributor information is not initially provided by the contributor, the PAC uses its best efforts to obtain information from its contributors. The PACs best efforts procedure includes sending a correspondence (that does not solicit a contribution) with a pre-addressed return envelope clearly requesting the name, address, occupation, and employer of the contributor who has missing information. The correspondence also includes the language of the Federal Election Campaign Act requiring the name, address, occupation, and employer of individuals who contribute more than \$200 in a calendar year. Further, follow-up requests for contributor information are made within 30 days of receiving the contribution, and the PAC updates its reports to include the missing information received from the contributor. The PAC is committed to ensuring compliance with all Commission reporting laws and regulations.